

Probable Witness

1. Brian Frazier
2. Caleb Moore
3. Kathy Gongloff
4. Kyle Henricks, CPA
5. Michael Ferguson

The Plaintiffs reserve the right to add to the above list of Witnesses any other witness later discovered or inadvertently omitted therefrom.

If necessary, Plaintiffs will rely on Rule 807 of the Federal Rules of Evidence to admit into evidence any one or more of the listed Exhibits and/or any other exhibits offered into evidence by the United States at trial.

The Plaintiffs further reserve the right to call any other witness as a rebuttal witness, whether named herein or not, and to introduce any other documents into evidence as rebuttal/impeachment exhibits, whether listed herein or not.

Dated: March 21, 2022.

Respectfully submitted,

/s/ Lyndel Anne Vargas

Lyndel Anne Vargas
State Bar No. 24058913
CAVAZOS HENDRICKS POIROT, P.C.
Suite 570, Founders Square
900 Jackson Street
Dallas, TX 75202
Phone: (214) 573-7344
Fax: (214) 573-7399
Email: LVargas@chfirm.com

Attorneys for Brian Frazier
and B. Frazier Management, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served this 21st day of March, 2022 by electronic transmission through the Court's automated Case Management and Electronic Docketing System for the U. S. Bankruptcy Court for the Northern District of Texas on all parties-in-interest submitting to service of papers in this case by said means.

/s/ Lyndel Anne Vargas

Lyndel Anne Vargas